

Message

From: Biscoe, Melanie [Biscoe.Melanie@epa.gov]
Sent: 10/28/2022 1:25:27 PM
To: Steeger, Thomas [Steeger.Thomas@epa.gov]; Sappington, Keith [Sappington.Keith@epa.gov]
CC: Garber, Kristina [Garber.Kristina@epa.gov]; Gavin, Quinn [Gavin.Quinn@epa.gov]; Tindall, Kelly [tindall.kelly@epa.gov]
Subject: RE: Seed Treatment Lubricants - Quick Question (accompanied by lots of excess words in the email)

Thank you Tom! This is really helpful.

Melanie L. Biscoe

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202-566-0701
(She/Her/Hers)

From: Steeger, Thomas <Steeger.Thomas@epa.gov>
Sent: Thursday, October 27, 2022 3:55 PM
To: Biscoe, Melanie <Biscoe.Melanie@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>
Cc: Garber, Kristina <Garber.Kristina@epa.gov>; Gavin, Quinn <Gavin.Quinn@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>
Subject: RE: Seed Treatment Lubricants - Quick Question (accompanied by lots of excess words in the email)

The “lubricants” that have historically been used with large pneumatic planters (which are most frequently associated with fugitive dust issues) are talc and graphite. Several years ago, EFED staff participated in the Corn Dust Research Consortium coordinated by the Pollinator Partnership. That consortium looked at the efficacy of a new lubricant (polymer) developed by Bayer compared to talc and graphite. The report and recommendations were published in 2017 at: <https://www.pollinator.org/pollinator.org/assets/generalFiles/CDRC-Executive-Summary-October-2017.pdf>. I do not know whether other synthetic lubricants for use in pneumatic planters have been developed subsequent to the efforts/results of the Corn Dust Research Consortium.

Tom

From: Biscoe, Melanie <Biscoe.Melanie@epa.gov>
Sent: Thursday, October 27, 2022 3:07 PM
To: Sappington, Keith <Sappington.Keith@epa.gov>; Steeger, Thomas <Steeger.Thomas@epa.gov>
Cc: Garber, Kristina <Garber.Kristina@epa.gov>; Gavin, Quinn <Gavin.Quinn@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>
Subject: Seed Treatment Lubricants - Quick Question (accompanied by lots of excess words in the email)

Keith and Tom,

As part of the “directionally correct” FIFRA mitigation, we are planning on restricting seed treatment lubricants to those that reduce dust. As part of the label language, we wanted to point growers to the specific dust-reducing lubricants they should be using. To that end, do you know which dust-reducing seed treatment lubricants are being used in the US right now?

Conversely, if we don’t have good examples to point to, we could prohibit use of talc, graphite, or talc/graphite combo lubricants on the label.

Side note #1: this would be only for on-farm treatments. We are proposing requiring a polymer seed coating for commercially treated seed.

Side note #2: We know that Canada has prohibited talc and talc/graphite lubricants, and it seems as though they are requiring a specific Bayer product as a dust reducing lubricant for neonics. I don't think OPP would want to specify the type of dust-reducing lubricant growers should use, unless we are pretty confident that not too many more dust-reducing lubricants are going to come into the marketplace. We would, however, want to provide examples of what could/should be used.

If you could get back to me sometime tomorrow, that'd be ideal – if not, Monday works too. I don't want you all to spin your wheels or do research on this, just thought you all would likely know more than most in OPP on what is happening on this front!

Thanks as always for your input!

Melanie L. Biscoe

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